

EXHIBIT “1”

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STEFANIE T. SHARP NSB 8661
 RUSSELL J. CARR NSB 15191
 Robison, Sharp, Sullivan & Brust
 71 Washington Street
 Reno, Nevada 89503
 Telephone: (775) 329-3151
 Facsimile: (775) 329-7169
 Email: ssharp@rssblaw.com
rcarr@rssblaw.com

*[Proposed] Special Counsel for Chapter 7 Trustee
 and Counsel for Dustin C. Youren*

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re:

DEBRA YOUREN

Debtor.

Case No.: 22-50556-hlb
 (Chapter 7)

DUSTIN C. YOUREN; and CHRISTINA W.
 LOVATO, Chapter 7 Trustee,

Plaintiffs,

vs.

AMERICAN ACGREDIT, FLCA, a Federally
 Chartered Farm Credit System Institution,
 DEBRA K. YOUREN; BUSTER ALLEY,

Defendants,

Adv. Proc. No. 24-05014-hlb

**STIPULATION TO AMEND
 CASE CAPTION ON SECOND
 AMENDED COMPLAINT**

Hrg Date: N/A
 Hrg Time: N/A

Plaintiffs Dustin C. Youren and Christina W. Lovato, Chapter 7 Trustee (“Plaintiffs”),
 Defendant American AgCredit, FLCA (“American AgCredit”) and Defendant Buster Alley
 (collectively “the parties”), by and through their counsel of record, hereby enter this stipulation:

1. On or about November 6, 2024, Plaintiffs filed a Second Amended Complaint (Doc.
 59).

2. On or about November 5, 2024, Defendant Buster Alley (“Alley”) filed a Motion to Dismiss Plaintiffs’ First Amended Complaint (Doc. 15).

3. The parties hereby stipulate that Alley’s Motion to Dismiss will apply to the Second Amended Complaint as the only change to the Second Amended Complaint is the case caption. All briefing deadlines will proceed in the normal course such that Plaintiffs’ Opposition to the Motion to Dismiss is due on or before November 19, 2024, and Defendant Alley’s Reply is due on or before November 26, 2024.

IT IS SO STIPULATED.

DATED this 6th day of November, 2024.

DATED this 6th day of November, 2024.

ROBISON, SHARP, SULLIVAN & BRUST

KAEMPFER CROWELL

/s/ Stefanie T. Sharp
STEFANIE T. SHARP, NSB 8661
RUSSELL J. CARR, NSB 15191
[Proposed] Special Counsel for Chapter 7
Trustee and Counsel for Dustin C. Youren

/s/ Louis M. Bubala
LOUIS M. BUBALA III, NSB 8974
Attorney for American AgCredit, FLCA

DATED this 6th day of November, 2024.

FLETCHER & LEE

/s/ Elizabeth Fletcher
ELIZABETH FLETCHER, NSB 10082
Attorneys for Defendant Buster Alley

CERTIFICATE OF SERVICE

Pursuant to FRBP 7005 and FRCP 5(b), I certify that I am an employee of ROBISON, SHARP, SULLIVAN & BRUST, that I am over the age of 18 and not a party to the above-referenced case, and that on the date below I caused to be served a true copy of the **STIPULATION TO AMEND CASE CAPTION ON SECOND AMENDED COMPLAINT** on all parties to this action by the method(s) indicated below:

X I hereby certify that on the date below, I electronically filed the foregoing with the Clerk of the Court by using the ECF system which served the following parties electronically:

DEBRA M. AMENS
AMENS LAW, LTD
432 S. BROAD ST.
BATTLE MOUNTAIN, NV 89310
(775) 235 2222
Fax : (775) 635 9146
Email: dmamens@gmail.com

SALLIE B ARMSTRONG
100 W. LIBERTY STREET, 10TH FLR
RENO, NV 89501
(775) 788-2000
Fax: (775) 788-2020
Email: sarmstrong@mcdonaldcarano.com

LOUIS M BUBALA, III
KAEMPFER CROWELL
50 W. LIBERTY STREET
SUITE 1100
RENO, NV 89501
775-852-3900
Fax: 775-327-2011 (fax)
Email: lbubala@kcnvlaw.com

Chapter 7 Trustee
CHRISTINA W. LOVATO
P.O. BOX 18417
RENO, NV 89511
(775) 851 1424
Email: trustee lovato@att.net

1 U.S. Trustee
2 U.S. TRUSTEE - RN - 7
3 300 BOOTH STREET, STE 3009
4 RENO, NV 89509
5 Email: USTPRegion17.RE.ECF@usdoj.gov

6 FLETCHER & LEE
7 Elizabeth Fletcher, Esq.
8 448 Ridge Street
9 Reno, Nevada 89501
10 Telephone: 775.324.1011
11 Facsimile: 775.499.5976
12 Email: efletcher@fletcherlawgroup.com

13 GERBER LAW OFFICES, LLP
14 Zachary A. Gerber, Esq. Nevada Bar No. 13128 491 4th Street
15 Elko, Nevada 89801
16 Telephone: 775.777.4357
17 Email: zag@gerberlaw.com

18 LOUIS M. BUBALA, III on behalf of Defendant AMERICAN AGCREDIT
19 lbubala@kcnvlaw.com, cdroessler@kcnvlaw.com; kmilks@kcnvlaw.com

20 DATED this 6th day of November 2024.

21 /s/ Celeste Hernandez
22 An Employee of Robison, Sharp, Sullivan & Brust
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